

5090  
Ser 62210LT/L9182-1  
1 July 1999

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Engineering Command  
To: Distribution  
Subj: MONTHLY PROGRESS REPORT FOR MAY 1999, ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,  
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA  
Encl: (1) May 1999 Monthly Progress Report (MPR)

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By direction

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HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

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## **MONTHLY PROGRESS REPORT**

**MAY 1999**

### **NAVAL FACILITIES ENGINEERING COMMAND**

#### **HUNTERS POINT SHIPYARD**

#### **1. PROGRESS DURING THE REPORT PERIOD**

The Hunters Point Shipyard (HPS) activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity.

##### **Field Work**

**PARCEL B:** Additional field work which remains from the initial data gap field effort consists of:

- (1) the completion of an additional phase of the infiltration study, and
- (2) completion of additional sampling on the off-site property adjacent to IR- 07 and 18 to determine the extent of contamination and possible migration.

Fieldwork for the revised infiltration study continued in this period. The results, which were originally scheduled to be reported in June, are now to be reported in July 1999. In addition to the evaluation of those sections with potential infiltration, the Navy continued to remove sediments from the continuously submerged portions of the storm drains that were not cleaned up in the facility wide removal action of storm drain sediments conducted in 1996. All of the sediments in the storm drains in Parcel B have now been removed. The portion of the infiltration study addressing the permeability of the trench bedding material has been started and will continue in June. The off-site work adjacent to IR-7 and IR-18, which is part of the data gaps work, has been combined with the remedial action monitoring plan well installation. The last of the monitoring wells will be installed in June and are expected to be sampled in July 1999.

Fieldwork has been completed in a sub-portion of Parcel B (preliminarily designated as B-3 using the area designations arising from the accelerated remedial action in this parcel) to better define the boundaries of the suspected nickel plume in the groundwater in IR-7 adjacent to the shoreline. The results of the B-3 fieldwork were presented in a short technical memorandum on March 12, 1999. Comments on this document were received as part of a larger set comments addressing Parcel B secondary documents received from the U.S. Environmental Protection Agency (EPA) on April 1, 1999. Department of Toxic Substances (DTSC) also include comments on this technical memorandum within a set of comments on the remedial design documents received on May 4, 1999. The Navy clarified in the Base Realignment Closure Act Cleanup Team (BCT) meeting held on June 8, 1999 that the document was for information purposes rather than review and therefore was not preparing responses to those comments but would consider them in future documents on the subject.

##### **Remedial Investigation (RI) Documents**

**PARCEL E:** As was noted in previous progress reports, the issues concerning the need for field validation of the ecological risk assessment brought up in the RI report are to be addressed through field

sampling. A report of the results will be incorporated in the draft final Parcel E Feasibility Study as an appendix. The draft report of the results is to be submitted on June 14, 1999.

As was stated in last month's progress report the response to agency comments on the draft final Parcel E RI are now final. The Parcel E RI will be considered complete once the results of the validation study have been published in June 1999.

### **Feasibility Study (FS) Reports**

**PARCEL C:** The schedule for the submittal of the revised draft Parcel C FS is revised to January 15, 2000 based on a conference call between the members of the BCT on May 4 1999. The schedule was revised to allow the submittal of two documents which will be incorporated into the FS, an analysis of the classification and beneficial uses of groundwater and potential A/B interconnections issues in Parcel C, and a risk management review of the soil and groundwater proposed remedial action.

**PARCEL D:** The submittal of a FS addendum has been agreed to by the BCT to address several issues brought up in the Parcel D ROD discussions. The schedule was revised to allow the submittal of the following two documents which will be incorporated into the FS; (1) an analysis of the classification and beneficial uses of groundwater and potential A/B interconnections issues in Parcel D which is to be submitted on July 15, 1999, and (2) a risk management review of the proposed soil remedial action which is to be submitted on June 21, 1999. The draft FS Addendum is scheduled for submittal on September 1, 1999.

**PARCEL E:** The revised schedule for the submittal of the draft final FS was discussed in a conference call on May 4, 1999. Based on that discussion, the revised date for the draft final FS is January 10, 2000. The schedule was revised to allow the submittal of two documents which will be incorporated into the FS, an analysis of the classification and beneficial uses of groundwater and potential A/B interconnections issues in Parcel E, and a risk management review of the soil and groundwater proposed remedial action. The draft final Parcel E Data Gaps Work Plan and Sampling Analysis Plan, which included the response to agency comments, was submitted on April 26, 1999. Comments on the draft final version were received from the EPA on May 13, 1999 and from DTSC on May 26, 1999 and written responses are being prepared. Responses to Agency Comments on the Draft Phase IV Radiation Investigation Field Sampling Work Plan were submitted May 4, 1999 as the Draft final submission for the Work Plan. The Work Plan will go final June 3, 1999.

**PARCEL F:** The approach to Parcel F and its relationship to the Navy's bay wide sediment approach was discussed on May 11, 1999 where the Navy proposed that Parcel F be included in the bay wide approach. The approach would include a work plan for re-evaluating the ecological risk assessments at several facilities and proposing additional sampling if necessary for sites such as HPS. The submittal date for the draft Bay-wide Ecological Risk Assessment Work Plan is July 16, 1999.

### **Proposed Plan (PP)**

The dates for the submission of the draft PPs for Parcels C, E and F have been revised to accommodate the changes to the submittal schedules for the documents which precede the PPs. The revised submission dates are July 15, 2000 for Parcel C, April 10, 2000 for Parcel E and April 19, 2001 for Parcel F. To allow for a revision to the Parcel D ROD based on the results of the ongoing risk management review process a revised PP for Parcel D is now scheduled for submittal on November 30, 1999.

### **Record of Decision (ROD)**

The revised schedule for the Parcel D ROD continues to be discussed at the BRAC Closure Team (BCT)/Remedial Project Managers (RPM) meetings. The revised schedule was discussed in a conference call with the BCT on May 4, 1999 and a submittal date for a revised Parcel D ROD of February 16, 2000 was agreed to. The Navy is evaluating their approach to the Parcel D cleanup. However, in the interim they are meeting with the BCT and conducting an evaluation of the proposed excavation areas. The evaluation is using a risk management approach to determine if this is a more appropriate way to handle the cleanup rather than the original parcel wide scheme. The results of the evaluation process will be documented in a technical memorandum which will be submitted on June 21, 1999.

### **Remedial Design Documents**

**PARCEL B:** The Remedial Design (RD) and Remedial Action (RA) documents have overlapping submittal and review cycles due to the accelerated schedule for the cleanup.

As was stated in comments received from EPA and DTSC on April 29, 1999 they consider the Remedial Design documents and Remedial Action work plan submitted on March 9, 1999 to be the draft final version as required under the Federal Facility Agreement. Under the FFA these documents would be considered to be final if no comments were received within 30 days or the documents would go to dispute resolution. However it was agreed between the Navy and the BCT that an extension to May 29, 1999 would provide adequate time to respond to the comments provided by the agencies. A conference call between the BCT was held on May 11, 1999 to further discuss the comments from the regulatory agencies. The responses to the comments on the draft final Remedial Design documents were submitted on May 21, 1999. On May 28, 1999 DTSC provided additional comments regarding the use of institutional controls and the enforcement mechanism that were part of the remedial design document and requested an extension until June 18, 1999 prior to approving the Remedial Design documents. Based on the significant issues raised, the Navy expects to request an extension of the June 18, 1999 date to July 23, 1999. A meeting to discuss the issues is scheduled with the BCT on June 7, 1999.

Additional secondary documents which support the Remedial Design documents consist of the Draft Parcel B Infiltration Study Report which will be submitted in July 1999 and the Draft final Technical Memorandum on the Distribution of the Bay Mud Aquitard and Characterization of the B-Aquifer in Parcel B which is also expected to be submitted in July 1999.

Additional revisions to the Parcel B RA documents were submitted on May 5, 1999; with additional revisions scheduled for June 15, 1999 and July 2, 1999. Revised sections and appendices to the RA documents were submitted to update the originally submitted documents with subsequent changes. Currently only the addenda for storm drain work remains to be submitted for review.

**PARCEL D:** Preparation of the Parcel D preliminary RD documents has been delayed due to unresolved issues for the Parcel D ROD.

### **Remedial Action Implementation**

The Parcel B remedial action which consists of backfilling continues. The work in Parcel B-1 consisted of 35 excavations comprising both remediation areas and de minimus areas. Of the 35 excavations requiring step outs, all but one are complete and being backfilled. To ensure that these open excavations do not fill up with rain water, the contractor is back-filling them with clean fill and planning to return

later to dig out the area of a particular side that remained contaminated next to the clean fill. As of the end of May approximately 78,500 tons of contaminated soil had been disposed of off site from the work in B-1. Approximately 75,300 tons of backfill has been imported with 42,800 cubic yards placed in the excavations.

The work in B-2 consists of excavating 65 areas, most of which are de minimus areas. Of these areas, 45 have been excavated to the original boundaries and the remaining 18 are still in progress or pending. Also almost completed in Parcel B-2 is the removal of approximately 2,300 linear feet of fuel lines and 5,800 linear feet of steam lines. As of the end of May approximately 15,042 tons of soil had been disposed of off site from the work in B-2. Approximately 4,280 tons of backfill has been imported.

### **Removal Actions**

See Section 6, Deliverables Status, for a description of the current status for the Removal Actions and a document deliverable update.

## **2. MEETINGS AND REPORTS SUBMITTED**

### **Meetings in May 1999**

No monthly BCT/RPM meeting was held during this period. A conference call was held between the Navy and the regulatory agencies to discuss the proposed revisions to the FFA schedules on May 4, 1999. A meeting on the field work being conducted for the additional data needed for the preparation of the petroleum Corrective Action Plans was held with the Regional Water Quality Control Board (RWQCB) was held on May 25, 1999.

No Restoration Advisory Board (RAB) meeting was held during this period.

### **Documents Submitted in May 1999**

The document submitted by the Navy during the report period were as follows:

- Response to Agency Comments on the Draft Phase IV Radiation Investigation Field Sampling Work Plan
- Response to Agency Comments on the Draft final Parcel B Remedial Design Documents
- Revision No. 8 to the Draft final Parcel B Remedial Action Work Plan
- Response to Agency/San Francisco Redevelopment Agency comments on the Draft final FOST for Parcel A

## **3. PROBLEMS ENCOUNTERED AND RESOLUTIONS**

### **Target Cleanup Level for Nickel in the Parcel B Remedial Action**

As was discussed in previous monthly progress reports, levels of nickel were encountered during the Parcel B remedial action which were above the target cleanup level documented in the Parcel B ROD. It appears that the nickel encountered may be due to the occurrence of nickel-rich bedrock at the site rather than due to contamination. To evaluate the possibility the Navy investigated the nature of the nickel

occurrence in conjunction with evaluating additional parameters that may be used as indicators. Following the receipt of comments from the regulatory agencies on a draft technical memorandum describing the Navy's revised approach to determining ambient nickel levels, a revised technical memorandum and written responses to comments was submitted on December 7, 1998. No further comments have been received but additional discussions concerning minor points were held in March and April and have been reflected in a revised approach. The approach will be used in Parcel B and facility wide when nickel is encountered as a chemical of concern and will be documented in a revised document which is now expected to be submitted in June.

#### **Petroleum-Only Sites at Hunters Point Shipyard (HPS)**

Significant issues were brought up in the comments on the draft Parcel B Petroleum Corrective Action Plan (CAP). The Navy has documented a revised approach which will be based on evaluating the current geochemical conditions in the petroleum contaminant plumes and the resultant implications for remediation in the Draft final Work Plan for Additional Data for the Petroleum Corrective Action Plans which was submitted on March 11, 1999. A meeting was held between the Navy and the RWQCB on May 25, 1999 to discuss the status of the fieldwork and any other TPH issues.

#### **Cleanup Scenario for Remedial Action at Parcel D**

As was discussed in previous monthly progress reports discussions have been held between the Navy and the BCT to discuss the issue of the cleanup approach for the soil cleanup in Parcel D. To resolve the issues it was determined that a review of the risk management process and the proposed remediation areas by the BCT could provide a fully protective remedy for human health and environment while being cost effective. The process took ten meetings to complete and will be documented in a technical memorandum that is scheduled to be submitted June 21, 1999. Based on the results of this process, the FS, PP and ROD for Parcel D would be revised to reflect the changes that may result. The issues raised by such a risk management review process could have a significant impact on the cleanup in the other parcels with a proposed industrial reuse, and a similar review is expected in Parcels C and E. The delays required to conduct such reviews are reflected in the revised FFA schedules for those parcels.

#### **Revised FFA Schedules**

The Navy and the members of the BCT have been discussing the need for revised FFA schedules for the parcels at HPS. A conference call was held on May 4, 1999 to further discuss the issues and agree on new FFA schedules. The new FFA schedules agreed to in that conference call were included in a letter from the EPA received on May 12, 1999 and will be submitted by the Navy in June or July 1999 following finalization of the dates by the BCT.

### **4. REPORTS AND ACTIVITIES FOR JUNE 1999**

#### **Documents Scheduled for Submittal in June 1999**

The following documents are scheduled to be submitted in the next report period:

- Final Proposed Nickel Screening and Implementation Plan
- Revised FFA Parcel Schedules
- Draft Parcel E Ecological Risk Assessment Validation Study Report

- Draft Parcel D Risk Management Review Process Report (Technical Memorandum)
- Response to Agency Comments on the Draft Exploratory Excavations Project Completion Report
- Response to Agency Comments on the Draft final Parcel E Data Gaps Work Plan

#### **Activities for June 1999**

**Field Work:** Continue data gaps field work in Parcel B and continue the remedial action in Parcel B sub-areas B-1 and B-2.

**Removal Actions:** Continue operation of the groundwater extraction system at IR-1/21 in Parcel E.

**Meetings:** Prepare for the BCT/RPM meetings scheduled for June 8, 1999. Also prepare for the RAB meeting to be held on June 23, 1999.

**Ongoing Work:** Continue work on various documents/studies/meetings.

#### **5. KEY PERSONNEL CHANGES**

DTSC's RPM for HPS is still to be determined. Until the replacement is designated, Mr. Chein Kao will act as the DTSC representative on the BCT.

#### **6. DELIVERABLES STATUS**

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), or removal action, as applicable, and their status. Please note that as deliverables are completed, they are not included in subsequent progress reports.

#### **Parcel A Reports**

**Final Parcel A Finding of Suitability to Transfer (FOST):** The draft final FOST was submitted on February 18, 1999. Comments were received from EPA on March 18, 1999. Additional comments were received from the City of San Francisco on April 13, 1999. The Navy submitted responses to the EPA and the City of San Francisco comments in the Parcel A Draft final FOST on May 17, 1999. A copy of the Draft final FOST and the Response to Agency Comments was forwarded for review by the RWQCB in July 1999.

#### **Parcel B Reports**

**Parcel B Remedial Design Package:** The final documents were submitted in March 23, 1999 however based on comments from the EPA and DTSC additional response to comments may be necessary.

**Parcel B Remedial Action Documents:** The draft final Remedial Action Documents (implementation work plan) were submitted on June 25, 1998 with a response to agency comments submitted in the first week of August. Additional minor revisions to the final Remedial Action Documents were submitted on May 5, 1999 with additional minor revisions expected on June 15, 1999 and July 2, 1999.



**Parcel B Infiltration Study:** The Parcel B infiltration study, which presents the proposed field investigation of the storm drain lines that are below the groundwater table and intersect contaminant plumes, was submitted on April 24, 1998. Comments were received from DTSC on May 18, 1998 and were received from the EPA and RWQCB on June 1 and 2, 1998. The draft final version was submitted on December 2, 1998 to the BCT. Comments have been received from EPA and RWQCB. The Navy submitted the draft final revised version with a response to comments on March 1, 1999 and is implementing the work and expects to submit the results in July or August 1999.

**Parcel B Proposed Nickel Screening Plan:** The Parcel B proposed nickel screening and implementation plan was submitted on December 7, 1998. After several conference calls between the BCT concerning the approach the Navy received written comments from EPA on April 1, 1999. Following review of the comments, a revised version was to be submitted in May but now is expected in June or July 1999.

#### **Parcel C Reports**

**Revised Draft final Parcel C FS Report:** The revised submittal date is January 15, 2000.

#### **Parcel D Reports**

**Revised Draft Parcel D ROD:** The revised submittal date is February 16, 2000.

#### **Parcel E Reports**

**Final Parcel E RI Report:** This document will be considered complete with the submittal of the draft ecological risk model validation study in June 1999.

**Draft Parcel E Ecological Risk Assessment (ERA) Model Validation Study Report:** The submittal date for the draft ERA Validation Study Report is June 14, 1999.

**Draft Parcel E FS Report:** The revised submittal date for the draft final Parcel E FS is January 10, 2000.

#### **Parcel F Reports**

**Draft Parcel F FS Report:** The revised draft Parcel F FS report is to be submitted on September 6, 2000.

#### **Facility-Wide Reports**

**Draft final Basewide FOSL:** The draft final FOSL was submitted on January 7, 1998. Response to Agency/SFRA comments on the Draft final Basewide FOSL was submitted on March 23, 1998. The Final Basewide FOSL of March 1998 may need to be updated before signature.

**Removal Actions**

<b>Removal Action</b>	<b>Status</b>	<b>Draft Construction Summary Report Submitted</b>	<b>Draft Final Construction Summary Report (CSR) Submitted</b>
Multi-Parcel, Exploratory Excavations	Fieldwork completed.	September 29, 1997	June 10, 1999
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. The draft final CSR report is undergoing review by the Navy. EPA submitted comments on May 14, 1998 and suggested additional discussion of the issues. The Navy will respond to EPA comments and then finalize the CSR.	August 2, 1996	Estimated 45 days after submission of Navy response to comments.
IR-1/21 Groundwater Removal Action	Fieldwork was completed and the ongoing operations and maintenance has begun for the groundwater extraction system.	January 29, 1999	Estimated 45 days after receipt of Agency comments
IR-3 Waste Oil Reclamation Ponds Removal Action (formerly reported as Floating Product Removal)	Fieldwork was completed.	February 26, 1999	Estimated 45 days after receipt of Agency comments
IR-6 Tank Farm Removal Action	Fieldwork completed. Comments were received on June 4, 1998 from the EPA.	February 23, 1998	June 1999



Richard Powell  
Lead Remedial Project Manager



Date